

**SEARS**

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Scott Walker  
Reports Analyst  
Report Analysis Division  
Federal Election Commission  
Washington, DC 20463

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Reference: Year End Report (11/28/00-12/31/00)

Dear Mr. Walker:

This letter is written in response to your recent letter to William Phelan. There was a clerical error with respect to the November 29, 2000 SearsPAC contributions to three candidates' committees which needs clarification. As you are aware, Senators Max Baucus and Bob Smith as well as Congressman Spencer Bachus are up for reelection in 2002. Since these contributions did not specifically designate a particular election, it is our intention that they are for the next election (i.e., the 2002 primary) as opposed to the 2002 general election. This is consistent with 11 CFR 110.2 (b) (2) (ii).

In addition, this letter corrects a clerical error and clarifies our intention regarding the December 13, 2000 SearsPAC contribution to Santorum 2000. Instead of reporting this contribution as a general election contribution, it should have been designated for debt reduction tied to the 2000 general election. Following your suggestion, we confirmed this intention with Senator Santorum's campaign committee.

Please let me know if you need any additional information.

Sincerely,



Secretary  
SearsPAC

cc: Penny Cate  
Ed Hauser  
William Phelan  
Sheila Rhoades

Federal Election Commission

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